

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

Joshua Hausfeld)
9300 Crimson Leaf Terrace)
Potomac, Maryland 20854,)
Plaintiff,) Civil Action No. _____
v.)
Love Funding Corporation)
1250 Connecticut Avenue, NW)
Suite 310)
Washington, DC 20036,)
Defendant.)

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1332 and 1441, Defendant Love Funding Corporation (“LFC” or “Defendant”) hereby removes to the United States District Court for the District of Maryland the lawsuit styled *Joshua Hausfeld v. Love Funding Corporation*, Case No. 385041-V, pending in the Circuit Court for Montgomery County, Maryland (the “State Court Action”). As grounds for removal, LFC states as follows:

1. On December 13, 2013, Plaintiff Joshua Hausfeld (“Plaintiff”) filed the State Court Action, asserting claims of violation of the Maryland Wage Payment and Collection Law and breach of contract, and seeking a declaratory judgment. The Complaint seeks declaratory relief and damages that exceed \$75,000.

2. As set forth below, this Court has original jurisdiction of the action under 28 U.S.C. §§ 1332(a)(1) and 1441(a), because there is complete diversity of citizenship between the parties and the amount in controversy, exclusive of interest and costs, exceeds \$75,000.

3. Plaintiff is a resident and domiciliary of the state of Maryland. *See* Complaint at 2, attached hereto as Exhibit A.

4. Defendant is a resident of Virginia, where it is incorporated, and the District of Columbia, where it maintains its principal place of business. *See* 28 U.S.C. § 1332(c)(1).

5. Plaintiff's Complaint reveals that the amount in controversy "exceeds \$75,000," exclusive of court costs and reasonable and necessary attorney's fees. *See* Exhibit A.

6. This action is not described in 28 U.S.C. § 1445.

7. Accordingly, this case is removable to this Court pursuant to 28 U.S.C. §§ 1332(a)(1) and 1441(a), because it is a civil action between citizens of different states and the amount in controversy exceeds the jurisdictional requirement of 28 U.S.C. § 1332(a). *See* Exhibit A.

8. Pursuant to 28 U.S.C. § 1446(a), a copy of the Complaint and all other process, pleadings, and orders served upon LFC in the State Court Action are being filed contemporaneously herewith. *See* Exhibit A. Pursuant to Local Rule 103.5(a), undersigned counsel hereby certifies that all documents now on file in the State Court Action are being filed herewith.

9. LFC was served with the Complaint in the State Court Action on December 18, 2013.

10. This Notice of Removal is timely because, pursuant to 28 U.S.C. § 1446(b), it was filed within thirty (30) days after LFC was served with a copy of the Complaint.

11. Pursuant to 28 U.S.C. § 1446(d), a Notice of Filing of Notice of Removal will be filed in the Circuit Court for Montgomery County, with copies served on counsel of record.

12. By virtue of this Notice of Removal, Defendants do not waive their right to assert any claims, defenses, including jurisdictional or otherwise, or any other motions permitted under the Federal Rules of Civil Procedure.

WHEREFORE, Defendant Love Funding Corporation respectfully requests that this action proceed in this Court as an action properly removed hereto.

Dated: January 17, 2014

Respectfully Submitted,

/s/ Alec W. Farr
Alec W. Farr (Bar No. 12513)
Bryan Cave LLP
1155 F Street NW, Suite 700
Washington, D.C. 20004
Phone: (202) 508-6000
Fax: (202) 220-6200
awfarr@bryancave.com

Counsel for Defendant Love Funding Corporation

Of Counsel:

Heather S. Goldman, Esq.
Brenda A. González, Esq.
Bryan Cave LLP
1155 F Street NW, Suite 700
Washington, D.C. 20004
Phone: (202) 508-6000
Fax: (202) 220-6200
heather.goldman@bryancave.com
brenda.gonzalez@bryancave.com

Counsel for Defendant Love Funding Corporation

CERTIFICATE OF SERVICE

I hereby certify that, on this 17th day of January 2014, a true and correct copy of the foregoing Notice of Removal was sent by first-class mail, postage prepaid, and electronic mail to:

Jeffrey M. Schwaber, Esq.
Deanna L. Peters, Esq.
Stein Sperling Bennett DeJong Driscoll PC
25 West Middle Lane
Rockville, Maryland 20850
jschwaber@steinsperling.com
dpeters@steinsperling.com

Counsel for Plaintiff Joshua Hausfeld

/s/ Alec W. Farr
Alec W. Farr